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DEFENDANT.

defendant herein, did use a facility of interstate commerce to knowingly persuade, induce, and entice, and to attempt to knowingly persuade, induce, and entice an individual who has not attained the age of 18 years to engage in any sexual activity for which any person can be charged with a criminal offense under federal, state and local law, in violation of Title 18, United States Code, Section 2422(b).

**PROBABLE CAUSE AFFIDAVIT**

I, Taun Yurek, Complainant, as and for probable cause, state the following:

1. The Complainant is a Detective with the Henderson Police Department (HPD), and have been so employed for approximately 5 years. Within HPD, I am assigned to the Computer Crimes Unit, which investigates crimes involving the use of computers and am currently on the Internet Crimes Against Children Taskforce (ICAC). Among my duties on the Computer Crimes Unit as well as ICAC is to conduct proactive investigations which focuses on crimes where computers and the Internet are used in the sexual exploitation of children. I have approximately 13 years as an Officer with the department, of which 3 years' experience is as a Detective and have received over 450 hours of training in the field of computer forensics, cellular phone forensics, child pornography, Internet crimes against children, and interview and interrogation. Specifically after joining ICAC, I've received basic, advanced, and on the job training in the investigation of cases involving the sexual exploitation of children.

2. This affidavit is made in support of a complaint charging **Roland Mark Pelletier** with violating Title 18, United States Code, Section 2422(b), which makes it illegal for a person to utilize a facility of interstate commerce to attempt to knowingly persuade, induce or entice an individual who has not attained the age of eighteen (18) years to engage in any sexual activity for which any person can be charged with a criminal offense.

**BACKGROUND REGARDING CHILD EXPLOITATION AND COMPUTERS**

3. From both training and experience, Complainant has gained knowledge in the operation of computers and the Internet. Based upon the training and experience of Complainant, as well as the training, knowledge, and experience of other law enforcement personnel involved in this investigation, Complainant knows the following:

a. The Internet is a worldwide computer network which connects computers and allows communications and the transfer of data and information across state and national boundaries.

1                   b.       Individuals who use the Internet can communicate with each other by  
2 using electronic mail, also known and referred to herein as "E-mail". E-mail is an electronic form of  
3 communication which can contain letter-type correspondence and graphic images. E-mail is similar  
4 to conventional paper-type mail in that it is addressed from one individual to another.

5                   c.       An E-mail message usually contains a header which gives the screen  
6 or account name, the identity of the Internet Service Provider, and the return address on the Internet  
7 (Internet Protocol address) of the individual who originated the message or graphic.

8                   d.       Individuals who use the Internet can also communicate with each other  
9 through the use of Instant Messaging, a/k/a "chatting," platforms. This is another form of electronic  
10 communication between individuals, in a real time format. When two individuals Instant Message  
11 with each other, they use a graphical user interface program that allows one person to initiate contact  
12 with the other, which opens up an Instant Messaging session. The two individuals can then exchange  
13 type written messages back and forth with one another in a real time type of format. These Instant  
14 Messaging programs also allow individuals to share pictures back and forth with one another, which  
15 displays the graphic to the other user while "chatting." An example of this type of program / platform  
16 is Yahoo Instant Messenger.

17                   e.       Email and Instant Messaging platforms like Yahoo Instant Messenger  
18 identify each user through a unique user account name, a/k/a "screen name," that uniquely identifies  
19 that specific user on that platform.

20                   f.       Email, Instant Messaging, and Chat users have the ability to set up a  
21 user profile page within their specific platform (example: Yahoo) where they can enter information  
22 about themselves that they want displayed to other users. The information contained within this is  
23 called a "profile."

24                   g.       A user can access the Internet from a computer network or Internet  
25 Service Provider (ISP) that connects to the Internet. An ISP assigns each user an Internet Protocol (IP)  
26 address. Each IP address is unique to that specific user / computer at that point in time on the internet

1 so that the computer can send and receive data / information. Utilizing the IP address and unique user  
2 account screen name of an individual communicating on the internet, it is possible for an investigator  
3 to establish investigative leads to assist in identifying an individual / computer on the internet.

4 h. Computer/Internet users can utilize and access various other forms of  
5 online communications, like bulletin board systems, where users can post messages and advertise  
6 items for sale or for free. One such service is called and hosted by Craigslist.com. On Craigslist,  
7 individuals can post information and specify the location of the item or interest. Craigslist contains  
8 informational postings regarding items for sale, items for free, community notifications and personal  
9 type advertisements. When a user makes a posting to Craigslist, they are required to enter a location,  
10 to categorize the type of communication so it can be properly listed by subject matter of relevance and  
11 to post the content, which consists of text, on the subject matter at hand. After a posting is made, a  
12 unique number is assigned by Craigslist for that posting. Persons who are interested in the posting can  
13 then correspond with the individual poster who made the posting, regarding the subject matter, by  
14 responding to the post. By responding to a post, this results in an email being sent to the individual  
15 who made the posting. If correspondence is to continue or if the original poster wants to further  
16 communicate with the individual who responded to the posting, they can then email each other back  
17 and forth or exchange information to speak in person or by other means of choice.

#### 18 INVESTIGATION

19 4. This complaint is based upon information obtained from my personal  
20 investigation, and investigation by other law enforcement personnel. Since January 3, 2012,  
21 Complainant has worked on an investigation of **Roland Mark Pelletier** relative to the criminal  
22 violation of Title 18, United States Code, Section 2422(b).

23 5. In part, Complainant's law enforcement duties include the proactive covert  
24 online investigation of Internet predators, who are seeking to solicit and entice minor children to meet  
25 for the purposes of sexual contact.

26 ....

1           6.           On January 3, 2012, Complainant initiated an online undercover investigation  
2 on the Internet. Located on Craigslist.com was a a "casual encounter" ad titled, "I'm looking for some  
3 playtime - m4w - 45 (vegas)." The ad read, "I'm looking for some playtime, Im white, 180, and  
4 somewhat good looking. Just got paid so roses are no problem. I like yung and older girls but all are  
5 encouraged to send me a text at four three nine thirteen seventy eight. Email on my android phone is  
6 slow so text is faster."

7           7.           Complainant e-mailed back, as a 13-year old girl, and a chat conversation  
8 ensued. Roland Pelletier sent a photo of himself, and complainant e-mailed a photo of a law  
9 enforcement officer that had been age-regressed to appear as if it was a 13-year old girl. After  
10 speaking about wanting to meet the girl for sexual purposes, Pelletier suddenly said that 13 was too  
11 young for him on January 5, 2012. When Complainant backed off, Pelletier asked "her" to prove that  
12 "she" was real. Shortly thereafter, the conversation ended.

13           8.           On January 24, 2012, Complainant saw, on Craigslist.com, a "casual encounter"  
14 ad where the poster posted an ad with the title, "im looking for some company.- m4w - 46." In the  
15 posting was a short narrative that wrote, "I'm looking for some company tonight. I would like this to  
16 be an ongoing relationship. Email me with a pic and a description of yourself and let's see what  
17 happens. I am white, 180 pounds, I consider myself some what a good looking. I like younger girls and  
18 I like older girls size or race does not matter. Roses are no problem."

19           9.           Complainant responded to the ad from an email account created strictly for the  
20 purpose of undercover operations as this one. The first email Complainant sent was simply an  
21 introduction, noted that Complainant was replying to his posted Craigslist advertisement, and asked  
22 if the poster was "down to kik it" with someone younger.

23           10.          Shortly later, the subject replied. The subject acknowledged it was his ad that  
24 he had posted stating, "Oh hell yes. Do you have a pic? The email that the subject used came from  
25 "rpelletier95@gmail.com". The name associated with the account was Roland Pelletier. Complainant  
26 told the subject "she" was only 13 years old and asked if he still wanted a picture and he replied that

1 he did. Complainant explained that "she" only traded pictures and that he needed to provide "her" with  
2 one also.

3 11. The subject sent a photograph of a white male with no hair standing next to a  
4 bear. Complainant recognized this picture from the previous contact with the subject via email. Using  
5 a forensically regressed image of a female officer, Complainant sent a photo of what appeared to be  
6 a 13 year old female to the subject. It should also be noted that any and all images used to confirm  
7 "identity" as a 13 year old female are never sexual or provocative in nature.

8 12. Complainant asked him where he lived and he advised he lived in the north side  
9 of town near Nellis and Las Vegas Blvd. He asked where he could pick "the girl" up and Complainant  
10 explained there was a Target near my residence on Lake Mead (350 W. Lake Mead Pkwy).  
11 Complainant told him that "she" would have to sneak out of "her" house after my grandmother fell  
12 asleep. He asked what Complainant would like to do. Complainant explained the girl normally like  
13 movies, going to the mall but that Complainant was into doing whatever he wanted to do. He asked  
14 "That depends on what you (are) wanting. You tell me." From their prior conversation Complainant  
15 know that he was talking about sex. Complainant explained to him that "she" just wanted to be careful  
16 and for him not to get me pregnant. Complainant asked him if he was going to wear protection and  
17 he advised, "If that's what you want."

18 13. On January 29, 2012, your Complainant spoke with Roland and told him that  
19 Complainant felt like he (the girl) was bothering him and if he did not want to speak anymore then to  
20 tell "her." Roland replied he wanted to meet with Complainant but was just not sure the girl was a real  
21 person. He asked for a picture of "the girl's" "private area" to convince him "the girl" was a real  
22 person. Complainant explained to him that "the girl" doesn't send pictures like that in fear of them  
23 being put onto the Internet.

24 14. Also on January 29, 2012 Roland wanted to meet with Complainant.  
25 Complainant explained that it was "the girl" could not meet with him because she had her period.  
26 Roland stated he was just not sure of being with a 13-year old. Complainant explained once again that

1 "she" did not want him to do anything he did not want to do and to just let "her" know so we didn't  
2 waste any more time. Roland stated, "I do want to do something with you. Just understand my  
3 concerns." He then stated, "Well, now your monthly is keeping us apart." Roland then said that he  
4 did not mind "the girl" having "her" period and that he, "really didn't mind the mess...." He said, "Its  
5 messy, but fun." The meeting was then put off until the next week.

6 15. On February 9, 2012, the conversation between Roland and Complainant  
7 continued. During the conversation, a meeting time and place at 350 W. Lake Mead Pkwy (Target),  
8 at approximately 12:00 p.m., was set.

9 16. On February 9, 2012, detectives set up surveillance at the meeting location at  
10 approximately 1045 hours. At approximately 11:07 a.m., a Gray Ford Econoline van drove into the  
11 Target parking lot and parked in the center aisle of Target. Subject was confirmed visually to be  
12 Roland Pelletier by Det. Nichols and the vehicle was registered to Roland Pelletier at 4593 Armel  
13 Court Las Vegas, NV 89115. Roland Pelletier exited the vehicle and entered Target. He was visually  
14 followed by Det. Fuentes inside of the store. Pelletier bought two unknown items at register number  
15 7. He then exited the store and got back into his van at approximately 11:17 a.m. He then remained  
16 in his van and communicated with "the girl" via email confirming the meet for 12 pm. Complainant  
17 replied yes and said that "the girl" would be on "her" way in a few moments. Although he was already  
18 in the parking lot, Pelletier replied that he would be at the Target in 20 minutes.

19 17. At approximately 12:00 p.m., Pelletier was taken into custody. In the Gray  
20 1981 Ford Econoline van was a package of gummy bear candy an LG Smartphone (Android) model  
21 LGL45C bearing S/N 110CYZP0107125, an LG flip style phone model NTLG400GB bearing S/N  
22 901CQXM534570 and an internal Western Digital hard drive bearing S/N WCAV2F298026.


23 18. During Pelletier's post-arrest interview, he admitted to having the chat  
24 conversations with "the girl" via email using his Android LG phone, but would not provide the  
25 passcode to review his phone. Pelletier advised that he has two computers at his residence at 4593  
26 Armel Court in Las Vegas. Pelletier said that he had arrived at Target to meet the girl and help her.

1 Pelletier advised that he had conversations with a couple of girls online and that he helped them in the  
2 past. Pelletier advised that the last girl he helped was a girl named "Tanya" approximately one month  
3 ago. He also advised that he has assisted another girl of unknown age a couple of years ago. Pelletier  
4 said that the two computers in his residence were previously in operation but believed that one had  
5 broken down 4 months ago and the other was broken down approximately 6 months ago. Pelletier then  
6 stated that he believed his wife had one of the computers working again and it was operational.

7 19. Based on my training, experience and the totality of the facts related, I have  
8 concluded that there is probable cause to believe that **Roland Mark Pelletier**, the above-named  
9 defendant, has violated Title 18, United States Code, Section 2422(b), Coercion and Enticement.

10  
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12   
13 Tawn Yurek, Detective  
14 Henderson Police Department  
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16 **SUBSCRIBED and SWORN** to before me  
17 this 10th day of February, 2012.

18   
19 UNITED STATES MAGISTRATE JUDGE  
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